

March 24, 2023

**VIA ECF**

The Honorable Sarah L. Cave  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

*Re: Catherine McKoy, et al. v. The Trump Corporation, et al.*, 18-cv-09936 (LGS) (SLC)

Dear Judge Cave:

We write jointly pursuant to the Court's March 8, 2023 Order, ECF 525, to report that the parties have completed all expert witness depositions and the two-hour deposition of ACN executive Robert Stevanovski. Accordingly, all discovery has now been completed.

Additionally, the parties have conferred and at this time, the parties do not believe that a settlement conference would be productive and plan to proceed to dispositive motions.

The parties thank the Court for its attention to this matter.

Respectfully submitted,

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